

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MARKET-DOMINANT PRICE CHANGE

Docket No. R2023-1

**NEWS/MEDIA ALLIANCE MOTION FOR
ISSUANCE OF INFORMATION REQUEST**
(October 18, 2022)

The News/Media Alliance ("N/MA") moves, pursuant to rule of practice 3010.170(e), for issuance of an Information Request asking the attached questions. These questions seek information relevant to whether and/or how the Postal Service has considered in its noticed rates the increase in Periodicals bundles caused by its transition from FSS scheme preparation to non-FSS scheme preparation.

Respectfully submitted,

NEWS/MEDIA ALLIANCE

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1. This question concerns the transition from Flat Sequencing System scheme preparation standards.

- a. Please confirm that in the September 22, 2022, issue of *Postal Bulletin*, page 5, the Postal Service states that effective November 7, 2022, the Postal Service will remove Flat Sequencing System (FSS) scheme preparation standards. If not confirmed, please explain fully.
- b. Please confirm that the July 14, 2022, issue of *Postal Bulletin*, pages 11-12, effective August 1, 2022, the Postal Service announced extensive changes to labeling lists, effective August 1, 2022, related to the discontinuance of FSS scheme preparation. If not confirmed, please explain fully.
- c. Please confirm that the changes in labeling lists apply to Periodicals Mail. If not confirmed, please explain fully.
- d. Please confirm that prior to these changes, Periodicals Mail could be prepared in FSS scheme bundles that combined carrier-route and 5-Digit pieces (as well as other pieces destined for the same FSS scheme). If not confirmed, please explain fully.
- e. Please confirm that because of the removal of the FSS scheme preparation standards, Periodicals mail destined for FSS ZIP Codes can no longer be entered in combined carrier-route and 5-Digit bundles and will be required to be entered carrier-route and 5-Digit bundles separately. If not confirmed, please explain fully.
- f. Please confirm that by being required to enter as separate bundles Carrier-route and 5-Digit mail previously entered in a combined bundle, Periodicals mailers will be required to enter more bundles than when FSS scheme preparation standards were in effect. If not confirmed, please explain fully.

2. Please refer to Library Reference USPS-LR-N2022-2-4, filed in Docket No. N2022-2 (the public response to interrogatory PR/USPS-T-2/1b).

Please refer to the document entitled "Flats Industry Force-Field Analysis" at page 2 entitled "Transitioning from FSS to Non FSS."

- a. Please confirm that among the “Negative Impacts” to the Flat industry listed is “Increase production cost because of more bundles.”
 - b. Please explain fully why “Transitioning from FSS to Non FSS Bundles” results in “[increase[d] production cost because of more bundles.”
 - c. Please confirm that among the “Negative Impacts” to the Flat industry listed is “Periodical postage increase.”
 - d. Please explain fully why “Transitioning from FSS to Non FSS Bundles” results in a “Periodicals postage increase.”
 - e. Please provide all Postal Service forecasts, estimates, and analyses of the additional volume of Periodicals Outside County bundles resulting from “Transitioning from FSS to Non FSS Bundles.”
 - f. Please provide all USPS forecasts, estimates, and analyses of the additional Periodicals Outside County postage resulting from “Transitioning from FSS to Non FSS bundles.”
3. Please refer to pages 23-24 of the United States Postal Service Notice of Market-Dominant Price Change, which discuss the Periodicals billing determinants adjustments that the Postal Service made in calculating the magnitude of the Periodicals rate increase, and USPS-LR-R2023-1/3 – Periodicals Workpapers.
- a. Please confirm that the Postal Service did not make any adjustments to the Periodicals billing determinants used to calculate revenue at new prices in USPS-LR-2023-1/3 to reflect the transitioning from FSS to Non FSS bundles. If not confirmed, please explain fully.
 - b. Please provide a revised version of USPS-LR-R2023-1/3 that incorporates adjustments to the Periodicals billing determinants used to calculate revenue at new prices to account for the *de facto* rate increase resulting from the transitioning from FSS to Non FSS bundles.